

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In Re:

W.R. GRACE & CO., et al.,

Reorganized Debtors.

CHAPTER 11

Case No. 01-01139 (KJC)
Jointly Administered

Relates to D.I. 31986

**CERTIFICATION OF COUNSEL REGARDING EXTENSION
OF DEADLINE FOR SUBMISSION OF RULE 706 EXPERT REPORT**

The undersigned counsel to Lukins & Annis, P.S., (“**Lukins & Annis**”) hereby certifies as follows regarding the proposed *Order Extending Deadline to Submit Rule 706 Expert Report* attached hereto as Exhibit A:

1. On April 3, 2014, the Court entered the *Order Appointing Rule 706 Expert Regarding Lukins & Annis Fee Allocation Claim* (the “**Rule 706 Expert Order**”) [Docket No. 31986], establishing Judith K. Fitzgerald (“**Judge Fitzgerald**”) as a Federal Rule of Evidence 706 expert to issue a report and recommendation (the “**Report**”) to the Court with respect to the Motion of Lukins & Annis P.S. For An Allocation Of The ZAI Class Action Common Fund Fee Award.

2. The Rule 706 Expert Order sets forth a deadline for submission of Judge Fitzgerald’s Report. Pursuant to paragraph 7 of the Rule 706 Expert Order, the Expert is to deliver a copy of the Report to the parties and to the Court within thirty (30) days after submission Lukins & Annis’s reply brief (the “**Expert Report Deadline**”). Lukins & Annis filed its reply brief on May 12, 2014 (Docket No. 32181). Accordingly, the 706 Expert Report is currently due on June 11, 2014.

3. The parties and Judge Fitzgerald have conferred and have agreed, subject to the Court's approval, to extend the Expert Report Deadline to June 30, 2014.

4. Attached hereto as Exhibit A is a proposed order, in a form approved by Judge Fitzgerald and the parties, extending the Expert Report Deadline to June 30, 2014.

WHEREFORE, Lukins & Annis respectfully requests that the Court enter the proposed form of Order attached hereto as Exhibit A.

Dated: May 29, 2014
Wilmington, Delaware

Respectfully submitted,

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